

UNITED STATES DISTRICT COURT

for the
Southern District of Florida
District of

Civil Division

FILED BY SJA D.C.

MAR 14 2025

ANGELA E. NOBLE
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Sharene Jenkins Kirkland, Pro Se
4202 Randy Court,
Mays Landing, NJ 08330

) Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Transportation Security Administration
6595 Springfield Center Dr,
Springfield VA, 22150

)) Jury Trial: (check one) Yes No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Sharene Jenkins Kirkland, Pro Se
Street Address	4202 Randy Ct
City and County	Mays Landing, Atlantic County
State and Zip Code	New Jersey, 08330
Telephone Number	(609) 992-1160
E-mail Address	fjrjerkinse@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Transportation Security Administration (TSA)</u>
Job or Title (<i>if known</i>)	
Street Address	<u>6595 Springfield Center Dr</u>
City and County	<u>Springfield, Fairfax County</u>
State and Zip Code	<u>Virginia, 22150</u>
Telephone Number	<u>(866) 289-9673</u>
E-mail Address (<i>if known</i>)	<u>TSA-ContactCenter@tsa.dhs.gov</u>

Defendant No. 2

Name	<u>Spirit Airlines</u>
Job or Title (<i>if known</i>)	
Street Address	<u>2711 Centerville Road, Suite 400</u>
City and County	<u>Wilmington, New Castle County</u>
State and Zip Code	<u>Delaware, 19808</u>
Telephone Number	<u>(855) 728-3555</u>
E-mail Address (<i>if known</i>)	<u>legal@spirit.com</u>

Defendant No. 3

Name	<u>Jane Doe 1, Jane Doe 2</u>
Job or Title (<i>if known</i>)	<u>TSA Security Officer</u>
Street Address	<u>100 Terminal Dr</u>
City and County	<u>Fort Lauderdale, Broward County</u>
State and Zip Code	<u>Florida, 33315</u>
Telephone Number	<u>(954) 359-1200</u>
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	<u>Jane Doe 3</u>
Job or Title (<i>if known</i>)	<u>TSA Security Supervising Officer</u>
Street Address	<u>100 Terminal Dr,</u>
City and County	<u>Fort Lauderdale, Broward County</u>
State and Zip Code	<u>Florida, 33315</u>
Telephone Number	<u>(954) 359-1200</u>
E-mail Address (<i>if known</i>)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

- Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1. This Court has jurisdiction under 28 U.S.C. § 1331, as this case arises under federal law, including violations of the Fourth Amendment to the U.S. Constitution and 42 U.S.C. § 1983.
2. Venue is proper in this Court pursuant to 28 U.S.C. § 1331(b), as the events giving rise to this claim occurred at Fort Lauderdale-Hollywood International Airport in Fort Lauderdale, Florida.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Sharene Jenkins Kirkland, Pro Se _____, is a citizen of the State of (name) New Jersey _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Jane Doe 1, Jane Doe 2, Jane Doe 3 _____, is a citizen of the State of (name) Florida _____. Or is a citizen of (foreign nation) _____.

4202 Randy Court
Mays Landing, N.J. 08330

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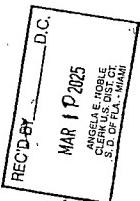
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Wilkie D. Ferguson Jr. U.S. Courthouse
400 North Miami Ave.
Miami Florida 33128

Certified

Jersey Knolls
Randy Court
Landing, N.J. 08330

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MIAMI DIVISION

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Miami, Florida 33132

filed